

# EXHIBIT M

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GLS LEASCO, INC. And )  
CENTRAL TRANSPORT LLC, )  
 )  
PLAINTIFFS, )  
 )  
VS. ) CASE NO. 23-cv-12927  
 )  
NAVISTAR, INC, )  
 )  
DEFENDANT. )

## ORAL DEPOSITION OF

## JIMMY DEAN LOLLIS

**AUGUST 6, 2024**

15 ORAL DEPOSITION OF JIMMY DEAN LOLLIS, produced as a  
16 witness at the instance of the PLAINTIFF, and duly  
17 sworn, was taken in the above-styled and numbered  
18 cause on the 6th of August, 2024, from 9:01 a.m. to  
19 4:52 p.m., before Jennifer Norman, CCR in and for the  
20 State of Arkansas, reported by machine shorthand, at  
21 the 1130 East Millap, Fayetteville, Arkansas 72703,  
22 pursuant to the Federal Rules of Civil Procedure.

1       their International dealer. So that's how we picked  
2       up an account that was in Detroit.

3       Q. Gotcha. All right. And so break down a little  
4       bit more, then, what your duties are in fleet sales.

5       A. Basically, representation to the customer. I'm  
6       basically the guy that goes and sees them; makes sure  
7       they're okay on a day-to-day basis; communicate with  
8       them. We work on specing the truck, make sure, you  
9       know, what they want to do as far as different type of  
10       componentry on the truck, build that, and then we work  
11       with Navistar to work through pricing and try to get  
12       the order finished up, and then work through delivery  
13       process, titling process, things like that. The  
14       dealer does that part of the job.

15       Q. Okay. All right. So would you say generally,  
16       then, just in your estimation, are your duties more  
17       facing the end customer like Central or PAM, or are  
18       you more working for Navistar? I mean, how would you  
19       kind of describe your role?

20       A. I work for the dealership.

21       Q. Yeah.

22       A. And I do work directly with the customer hopefully  
23       on a day-to-day basis.

24       Q. Okay. And how about with Navistar; how often  
25       would you interface with them?

1 A. You pretty well look at Navistar almost daily  
2 depending on what you're doing with them. Of course,  
3 obviously, I have to use their computer system, and I  
4 look at data that comes to me; so I check that daily.

5 As far as working with the corporate  
6 people, a lot of that has to do with early on when  
7 they're working through pricing and construction,  
8 build dates, and stuff like that.

9 Q. Okay.

10 A. And then, you know, we have, you know, regular  
11 calls -- you know, not scheduled, but regular calls  
12 based on what's going on with the account at the time.

13 Q. Okay. All right. So tell me a little bit, then,  
14 about the -- and I'm -- I obviously want to talk about  
15 just Navistar here. I understand Summit would work  
16 with other manufacturers, but here I'm just curious  
17 about Navistar.

18 So when you say that you work with them  
19 on pricing, construction build dates, things like  
20 that, give me a little bit more detail.

21 A. As far as working with Navistar?

22 Q. Correct.

23 A. Well, as far as the --

24 Q. I apologize. And that was, like, multiple parts  
25 in the question.

1 Q. Okay. All right. So here is my question, then.  
2 So I guess you're -- well, let me ask you this.

3 What's your general familiarity with what  
4 this lawsuit has to do with? Let's put it that way.  
5 In your words.

6 A. The way I understand this, it has to do with the  
7 delivery timing of the deal that was supposed to hit  
8 in 2022.

9 Q. All right. And say a little bit more about that.  
10 What do you mean by that?

11 A. Well, the trucks were not delivered as the cover  
12 letter states.

13 Q. All right. All right. And so you were involved  
14 with -- either at Summit, Rush, or Allegiance, you  
15 were handling this account from the first agreement  
16 being signed all the way until the last truck under  
17 that agreement was delivered; right?

18 A. I was.

19 Q. And the last truck wasn't delivered until sometime  
20 in 2023; right?

21 A. Yes. There was one lone straggler. There was one  
22 truck that was totaled out as it was being transported  
23 to Central Transport, and we had a brand-new one  
24 built. So that was kind of the last straggler. It  
25 literally wasn't delivered until August of 2023. But